REMARKS

This is a full and timely response to the outstanding final Office Action mailed May 20, 2005. Reconsideration and allowance of the application and pending claims are respectfully requested.

I. Claim Rejections - 35 U.S.C. § 102(e)

Claims 1, 3, 5-11, and 24-42 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Casey, et al. ("Casey," U.S. Pat. No. 6,452,695). Applicant respectfully traverses this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the Casey reference.

A. The Casey Disclosure

Casey discloses a system and method for enabling an image input device and a printer to operate as a digital copier. Casey, Patent Title. The system includes an "adapter device 100" that interconnects a printer 200 with an image input device 300. Casey, column 2, lines 55-62. The architecture of the adapter device is described by Casey in relation to Figure 2 and columns 3-5.

The adapter device includes a central processing unit or "processor" 140, memory 130, an I/O controller 120, and a control panel 110. Casey, column 3, lines 13-33. The control panel

110 comprises buttons 112 and a display 114. Casey, column 3, lines 35-40. As is described by Casey, the adapter device is "preferably packaged such that all of the components, with the exception of the control panel 110, are contained within a housing or on a relatively compact peripheral card device". Casey, column 4, line 65 to column 5, line 1. Therefore, Casey's adapter device preferably comprises an independent hardware component that can be used in conjunction with a printer and an image input device.

In addition to the above-described configuration, Casey discloses that the adapter device can be "integrated within a printer 200 or within an image input device 300 to enable direct connection between the peripheral devices (without the need for a host computer) thereby imparting the capability of the digital copier operation described herein." Casey, column 5, lines 17-21.

B. Applicant's Claims

1. Claims 1, 3, 5-11

Independent claim 1 provides as follows (emphasis added):

> 1. A system for improving the performance of a plurality of peripheral devices, comprising:
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> a first peripheral device comprising a first software component and having a first functionality; and
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> a second peripheral device comprising a second software component and having a second functionality, the second peripheral device being coupled to the first peripheral device without an intermediate computing device positioned along the communication path between the peripheral devices, the first and second peripheral devices together performing a third functionality in addition to the first and second functionalities and having a common user interface

wherein the first peripheral device comprises a peripheral device display on which can presented a graphical user interface that presents the third functionality to a user for selection.

Applicant notes that Casey does not teach a first peripheral device that comprises a peripheral device display that can be used to present a graphical user interface to a user. Instead, as is described above, Casey teaches, and only teaches, an independent adapter device that can be added to an image input device. As is also described above, Casey's adapter device comprises its own control panel with its own display 114. It therefore logically follows that no graphical user interface is presented to the user *in the peripheral device display.* Even assuming, *arguendo*, that a graphical user interface is presented to a user in the Casey system, such an interface would be presented in Casey's control panel display 114, *not* a display of Casey's image input device.

In view of at least the foregoing, Applicant submits that claim 1, and its dependents, are allowable over Casey. Applicant therefore respectfully requests withdrawal of the rejection.

With specific regard to dependent claim 3, Casey does not teach first and second peripheral devices that are "coupled via a network". Although Casey shows a network 400 that is connected to the adapter device 100 in Figure 1, the printer 200 and the image input device 300 communicate directly via the adapter device. No network is used.

Regarding dependent claim 8, Casey does not teach software components of first and second peripheral devices exchanging information "over a network" for reasons described above in relation to claim 3.

Regarding dependent claim 11, Casey says nothing of presenting a "menu of available functionality". Again, 35 U.S.C. § 102 requires that a reference teach *each and every* claim limitation.

2. Claims 24-31

Independent claim 24 provides as follows (emphasis added):

> 24. A method ***practiced by a personal computer (PC)*** for providing additional functionality from peripheral devices, the method comprising:
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> ***searching for and identifying peripheral devices that are accessible to the PC***;
>
> determining the capabilities of each identified peripheral device using the PC; and
>
> presenting to the user with the PC a functionality that is available through combination of the capabilities of the identified peripheral devices, the functionality being a functionality that is not independently provided by the identified peripheral devices.

As a first matter in regard to claim 24, Casey does not teach a method for providing additional functionality from peripheral devices "practiced by a personal computer (PC)". It is clear from Casey's disclosure (described above) that Casey's "adapter device" is not a personal computer. If it were, Casey would have described the adapter device as being a "PC," as Casey described component 410 in Figure 1.

Not only is Casey's adapter device not a personal computer, Casey further *teaches away* from such an arrangement. As is noted above, Casey states that the adapter device can be "integrated within a printer 200 or within an image input device 300 to enable direct connection between the peripheral devices (without the need for a host computer) thereby imparting the capability of the digital copier operation described herein." Casey, column 5, lines 17-21. Clearly if the "adapter device" can be integrated within an image input device, such as a digital camera, the adapter cannot be a personal computer. Moreover, Casey explicitly advocates communication between the peripheral devices "without the need for a host computer".

Casey further does not teach the action of "searching for and identifying peripheral devices that are accessible to the PC", as is also required by claim 24. Simply stated, Casey provides no such disclosure.

For at least the foregoing reasons, Applicant submits that claim 24, and its dependents, are allowable over Casey. Applicant therefore respectfully requests withdrawal of the rejection as to claims 24-31.

With specific regard to dependent claim 25, Casey clearly does not disclose "automatically querying all peripheral devices on a network to which the PC is connected". Column 4, lines 50-64 of the Casey reference, which were identified in the final Office Action, do not provide such a teaching.

Regarding dependent claim 27, Casey says nothing about storing information in a "registry of the PC".

Regarding dependent claim 29, Casey says nothing about a "pull-down menu".

Regarding dependent claim 30, Casey say nothing about displaying a "complete set of tasks that can be performed through combination of the capabilities of the identified peripheral devices".

3. Claims 32-37

Independent claim 32 provides as follows (emphasis added):

> 32. A ***personal computer (PC)***, comprising:
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> a processor; and
>
> memory comprising peripheral device software that is ***configured to search for and identify peripheral devices***, to determine the capabilities of each identified peripheral device using the PC, and to present to a user a functionality that is available through combination of the capabilities of the

identified peripheral devices, the functionality being a functionality that is not independently provided by the identified peripheral devices.

Regarding claim 32, Casey does not teach a "personal computer (PC)" that performs any of the actions described in claim 32. See discussion of claim 24 above. Moreover, as is also noted above, Casey does not teach any device that is configured to "search for and identify peripheral devices". For at least these reasons, Applicant submits that claim 32, and its dependents, are allowable over Casey. Applicant therefore respectfully requests withdrawal of the rejection as to claims 32-37.

With specific regard to dependent claim 33, Casey clearly does not disclose a device that is configured to "automatically query all peripheral devices on a network to which the PC is connected". See the discussion of claim 25 above.

Regarding dependent claim 36, Casey says nothing about displaying a "complete set of tasks that can be performed through combination of the capabilities of the identified peripheral devices". See the discussion of claim 30 above.

4. Claims 38-42

Independent claim 38 provides as follows (emphasis added):

38. A peripheral device, comprising:

auto recognition logic that is configured to:

transmit a broadcast message on a network to announce the presence of the peripheral device on the network,

receive response signals from compatible peripheral devices also on the network, the response signals comprising information as to the identity and capabilities of the compatible peripheral devices, and

automatically present a functionality option to a user that is only available through combination of the capabilities of the peripheral device and at least one of the compatible peripheral devices.

Regarding claim 38, nothing in the Casey disclosure teaches transmitting a "broadcast message on a network to announce the presence of the peripheral device on the network". Applicant therefore submits that claim 38, and its dependents, are allowable over Casey. Applicant therefore respectfully requests withdrawal of the rejection as to claims 38-42.

II. Claim Rejections - 35 U.S.C. § 103(a)

Claims 4 and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Casey in view of the Wireless Networks document. Applicants respectfully traverse this rejection.

As is identified above in reference to independent claim 1, Casey fails to teach explicit limitations of Applicants' claims. In that the Wireless Networks document does not remedy the deficiencies of the Casey reference, Applicant respectfully submits that remaining claim 4, which depends from claim 1, is allowable for at least the same reasons that claim 1 is allowable over Casey. Applicant therefore requests that the rejection of claim 4 be withdrawn.

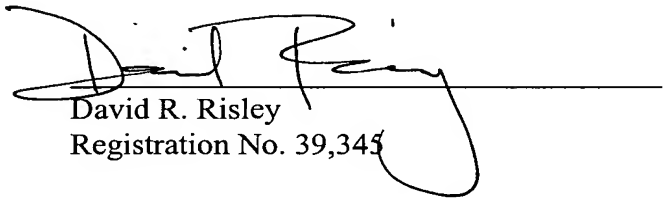
III. Canceled Claims

Claims 2, 7, and 12-23 have been canceled from the application without prejudice, waiver, or disclaimer. Applicant reserves the right to present these canceled claims, or variants thereof, in continuing applications to be filed subsequently.

CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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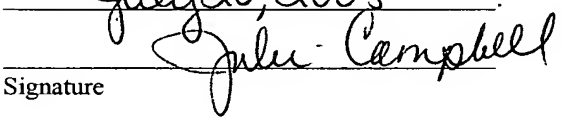

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